

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA**

GOFF GROUP, INC., et al.	)	
	)	
Plaintiff,	)	
	)	CASE NO. 2:06-cv-00389-SRW
vs.	)	
	)	
PHOENIX-DURANGO, LLC, et al.	)	
	)	
Defendant.	)	

---

**JOINT MOTION FOR EXTENTION OF TIME IN WHICH  
TO RESPOND TO THIRD-PARTY COMPLAINT**

---

Come now Defendant, Phoenix-Durango, LLC, and newly added Counter Claim Defendant, SunTrust Bank, and file this Motion for Extension and as grounds therefore state that SunTrust Bank has requested and Phoenix-Durango, LLC has agreed to allow SunTrust Bank to file its responsive pleading on or before Tuesday, July 11, 2006, and said response to be treated as if timely filed pursuant to Rule 12, FRCP.

Respectfully submitted,

/s/ I. Ripon Britton, Jr.

---

I. RIPON BRITTON, JR. (ASB4293-T831)  
Attorney for SunTrust Bank  
rbritton@handarendall.com

OF COUNSEL:  
Hand Arendall, LLC  
2001 Park Place North  
1200 Park Place Tower  
Birmingham, AL 35203  
(205) 324-4400 telephone  
(205) 311-1163 facsimile

OF COUNSEL:

Stokes, Lazaurus & Carmichael, LLP  
80 Peachtree Park Drive  
Atlanta, GA 30309-1320  
(404) 352-1465 telephone  
(404) 352-8463 facsimile

OF COUNSEL:

Walston, Wells & Birchall, LLP  
1815 5<sup>th</sup> Avenue North, Suite 1100  
Birmingham, AL 35203  
(205) 244-5200 telephone  
(205) 244-5400 facsimile

/s/ Michael J. Ernst (with permission)

---

MICHAEL J. ERNST  
mje@slclaw.com

(PRO HAC VICE MOTION FOR  
ADMITTANCE TO BE FILED)

/s/ C. Ellis Brazeal (with permission)

---

C. ELLIS BRAZEAL  
Attorney for Pheonix-Durango, LLC  
ebrazeal@walstonwells.com

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

GOFF GROUP, INC., et al.	)	
	)	
Plaintiff,	)	
	)	CASE NO. 2:06-cv-00389-SRW
vs.	)	
	)	
PHOENIX-DURANGO, LLC, et al.	)	
	)	
Defendant.	)	

---

CERTIFICATE OF SERVICE

---

I hereby certify that on June 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/EF system which will send notification of such filing to the following:

Winston Whitehead Edwards  
wedward@crdlawfirm.com

*(Attorney for Atkinson, Haskins, Nellis, Holeman, Brittingham)*

Jason James Baird  
jbaird@slatenlaw.com

*(Attorney for Arthur M. Leadingham, Jr.)*

Thomas T. Gallion, III  
mp@hsy.com

*(Attorney for John W. Goff and Goff Group, Inc.)*

that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

AAA Groundskeepers  
3211 Le Bron Road  
Montgomery, AL 36106  
*(Pro Se)*

Robert M. Bowick  
*(Pro Se)*

Cameron M. Harris & Co. Inc.  
*(Pro Se)*

Companion Property & Casualty Insurance  
Company  
c/o James F. Garrett, Registered Agent  
184 Commerce Street  
Montgomery, AL 36104  
*(Pro Se)*

William Joseph Duncan  
*(Pro Se)*

GE Capital Corporation  
c/o the Corporation Company,  
Registered Agent  
2000 Interstate Park Drive, Ste. 204  
Montgomery, AL 36109  
*(Pro Se)*

Greenwich Insurance Company  
c/o S. David Parsons, Commissioner,  
Registered Agent for Greenwich  
Alabama Department of Insurance  
201 Monroe Street, Suite 1700  
Montgomery, AL 36130-3351  
*(Pro Se)*

MBNA America Bank  
Registered Agent, MBNA America Bank  
1100 North King Street  
Wilmington, DE 19884  
*(Pro Se)*

Stuart Allan & Associates, Inc.  
CSC Lawyers Incorporating Service, Inc.  
Registered Agent  
150 Perry Street  
Montgomery, AL 36104  
*(Pro Se)*

Willis of North America  
The Corporation Trust Company  
Registered Agent  
1209 Orange Street  
Wilmington, DE 19801  
*(Pro Se)*

XL Specialty Group  
c/o Richard Ball, Registered Agent  
2000 Interstate Park Drive, Suite 204  
Montgomery, AL 36109

Kemmons Wilson, Inc.  
CSC Lawyers Incorporating Service, Inc.  
Registered Agent  
150 Perry Street  
Montgomery, AL 36104  
*(Pro Se)*

State of Alabama  
Office of the Attorney General  
Alabama State House  
11 South Union Street  
Montgomery, AL 36130  
*(Pro Se)*

United States of America  
*(Pro Se)*

Lewis B. Hickman, Jr.  
915 S. Hull Street  
Montgomery, AL 36104

/s/ I. Ripon Britton, Jr.

---

I. RIPON BRITTON, JR. (ASB4293-T831)  
Attorney for SunTrust Bank  
rbritton@handarendall.com

OF COUNSEL:  
Hand Arendall, LLC  
2001 Park Place North  
1200 Park Place Tower  
Birmingham, AL 35203  
(205) 324-4400 telephone  
(205) 311-1163 facsimile